

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Quinton Jones SR

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

PRECISION Tune Auto Care
Darrell Owens

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Quinton Markquice Jones Sr.</u>
Street Address	<u>3305 Provence St</u>
City and County	<u>Chattanooga Hamilton Co</u>
State and Zip Code	<u>Tennessee 37411</u>
Telephone Number	<u>423-755-1008</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Precision Tune Auto Care</u>
Job or Title (if known)	<u>Auto Repair Shop</u>
Street Address	<u>1118 Knox Abbott Dr.</u>
City and County	<u>Cayce Lexington Co</u>
State and Zip Code	<u>South Carolina 29033</u>
Telephone Number	<u>803-739-4368</u>

Defendant No. 2

Name	<u>Darrell Owens</u>
Job or Title (if known)	<u>Automotive Service and "Repair Expert"</u>
Street Address	<u>1118 Knox Abbott Dr.</u>
City and County	<u>Cayce Lexington Co</u>
State and Zip Code	<u>South Carolina 29033</u>
Telephone Number	<u>803-739-4368</u>

Defendant No. 3

Name	<u></u>
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Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

Defendant No. 4

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Quinton Jones Sr, is a citizen of the State of (name) Tennessee.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Precision Tune Auto Care, is incorporated under the laws of the State of (name) South Carolina, and has its principal place of business in the State of (name) South Carolina. Or is incorporated under the laws of (foreign nation) South Carolina, and has its principal place of business in (name) South Carolina.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$10,714.56; 5132.52 for additional aub repairs and tow; 1387.04 Rental car fees; \$4,500 for Pain and suffering, Emotional Distress, and Inconvenience.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

January 15, 2024 I took my truck to Precision Tune Auto Care due to an oil leak that was coming from the back of my truck Darrell stated the issue told me the cost and how long the repair took which was 1 day. After not hearing from him that 1 day, I called the shop and he stated they

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Repair Shop damaged transmission while repairing rear main sealant that was also installed incorrectly.

And she'll call when he finishes. Later that day Darrell called to tell the truck was ready. Then after proceeded to tell that the truck ~~was~~ transmission wasn't driving correctly, I stated then there was nothing wrong with the transmission that it drove perfectly fine when I dropped it off at the shop. Being the truck was drove from Chattanooga TN with no issues. Darrell stated he keep working on it to figure out the issue, 9 days went by. I heard not from Darrell. Talked to him several times within 8 weeks time ^{But replaced some converter.} nothing. So I just decided to go get my truck. When I got there to get truck, I noticed the hood was ajar on one side. So he stated one day that turned into 1 week. ~~Then~~ Towed truck home. Then to another shop where truck is being repaired. Mechanics there stated that the job Darrell repaired wasn't repaired correctly and that the transmission was damaged that was the reason it was giving issues with exelling. ^{While the rear main seal was being repaired}

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

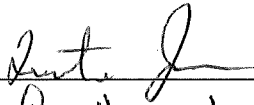
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-29, 2024.

Signature of Plaintiff

Printed Name of Plaintiff


Quinton Jones

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

